

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: ZOLOFT (SERTRALINE	:	MDL NO. 2342
HYDROCHLORIDE) PRODUCTS	:	
LIABILITY LITIGATION	:	12-MD-2342
	:	
THIS DOCUMENT RELATES TO:	:	HON. CYNTHIA M. RUFÉ
ALL ACTIONS	:	
	:	

**DEFENDANTS' MOTION TO DE-DESIGNATE DOCUMENTS
MARKED AS CONFIDENTIAL BY PLAINTIFFS
REGARDING THEIR COMMUNICATIONS WITH STUDY AUTHORS**

Defendants Pfizer Inc., including its former division J.B. Roerig & Co., Pfizer International LLC, and Greenstone LLC respectfully move to de-designate documents marked as confidential by plaintiffs regarding their communications with study authors. As set forth in the accompanying memorandum of law, incorporated herein, there is no legitimate basis for Plaintiffs' confidentiality designations.

WHEREFORE, Defendants respectfully request that this Court grant Defendants' Motion to De-Designate Documents Marked as Confidential by Plaintiffs Regarding their Communications with Study Authors.

Dated: New York, New York
August 17, 2015

Respectfully submitted,

/s/ Mark S. Cheffo

Mark S. Cheffo

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Greenstone LLC*

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which sends electronic notification of such filing to all CM/ECF participants. An unredacted version of the foregoing is being lodged with the chambers of the Honorable Cynthia M. Rufe contemporaneously with this filing and has also been served via First Class U.S. Mail upon Mark P. Robinson, Jr. and Dianne Nast of the Plaintiffs' Steering Committee.

Dated: New York, New York
August 17, 2015

/s/ Mark S. Cheffo
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